



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

Nov 15 9 47 AM '00

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FILE: 6446-7A

LIBRARY: REPLY TO THE ATTENTION OF:

NOV 14 2000

Mr. Johnny W. Reising
United States Department of Energy
Feed Materials Production Center
P.O. Box 398705
Cincinnati, Ohio 45239-8705

SRF-5J

RE: IEMP Revised Data
Reporting

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) Integrated Environmental Monitoring Plan (IEMP), Revision 2.

This document focuses on data reporting changes to future IEMP reports. Overall, U.S. EPA concurs with U.S. DOE's recommended changes in reporting. U.S. EPA has attached specific comments on the document, but a few noteworthy issues are discussed below.

The purpose of the reports is to make the Agencies aware of trends, anomalies and on-site deviations before off-site exceedences occur. This will allow for project specific adjustments. Therefore, the reports must note and discuss trends, as well as any notable results.

Further, U.S. DOE must assume that all parties reading the IEMP reports may not participate in the weekly project conference calls. Therefore, a detailed description of the issue and resolution must be presented.

Finally, in the summary sections U.S. DOE should assume that a reviewer of the IEMP may not have seen the Extranet data. Therefore, more detailed descriptions, tables or summaries may be required when describing trends, anomalies, or other issues.

U.S. EPA will continue to review and comment on the IEMP reports to assure that the proper information is being presented and the IEMP reports achieve their goals.

Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,



James A. Saric
Remedial Project Manager
Federal Facilities Section
SFD Remedial Response Branch #2

Enclosure

cc: Tom Schneider, OEPA-SWDO
Kim Chaney, U.S. DOE-HDQ
John Bradburne, Fluor Fernald
Terry Hagen, Fluor Fernald
Tim Poff, Fluor Fernald

TECHNICAL REVIEW COMMENTS ON DRAFT FINAL
"INTEGRATED ENVIRONMENTAL MANAGEMENT PLAN, REVISION 2"

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 3.4.2.3 Page #: 3-21 Line #: Not applicable (NA)
Original Specific Comment #: 1

Comment: The attached summary of changes notes that hexavalent chromium has been deleted from the "short list" of constituents to be frequently analyzed for. However, Table 3-2, which categorizes all of the groundwater final remediation level (FRL) constituents, omits hexavalent chromium even though it remains in the Record of Decision (ROD) and has a groundwater FRL. Unless hexavalent chromium is removed from the ROD, the chemical should be included in Table 3-2 as a nonpersistent groundwater contaminant, and groundwater samples should be analyzed for this chemical every 5 years.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 6.5.2.2 Page #: 6-27 Line #: NA
Original Specific Comment #: 2

Comment: The text describes different quality control requirements for biweekly uranium and biweekly thorium filters. Uranium filters are to be spiked on a biweekly basis, but thorium filters are to be spiked quarterly. Because biweekly thorium sampling is a new addition to the Integrated Environmental Management Plan (IEMP), it would be logical to implement more stringent quality control requirements for thorium filters at the beginning of the sampling program. The text should provide justification for the thorium filter spiking frequency specified in the text.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 8.3.3 Page #: 8-6 Line #: NA
Original Specific Comment #: 3

Comment: This section proposes a significant change in the quarterly reporting system. The key to the revised system will be use of a password-protected database on a U.S. Department of Energy (DOE) server in lieu of submittal of most paper reports. There are many potential difficulties with implementing and maintaining such a system. The old and new reporting systems should be used in parallel until it is certain that the new system is capable of meeting reporting objectives.

the appendix. Unless hexavalent chromium and its FRL are removed from the ROD, this constituent should be included in the appendix. However, it is reasonable to consider hexavalent chromium a "<N" constituent for which groundwater samples should be analyzed only every 5 years.

Commenting Organization: U.S. EPA

Commentor: Saric

Appendix #: C

Page #: C-6

Line #: NA

Original Specific Comment #: 8

Comment: The text should be revised to refer to Section C.3.1.2 rather than Section C.2.1.2.